

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, ESQ., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs. I submit this Certification based on personal knowledge in support of Plaintiffs' Steering Committee's Daubert Motion to Exclude the Opinions of Expert Witness Dr. Analisa Difeo.
2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of Analisa DiFeo, Ph.D. (General), dated May 28, 2024.
3. Attached hereto as Exhibit 2 is a true and correct copy of the Deposition of Expert Analisa DiFeo, Ph.D., dated June 28, 2024.
4. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Report of Kevin Holcomb, MD, FACOG (Gallardo), dated May 28, 2024.

5. Attached hereto as Exhibit 4 is a true and correct copy of “Variant Classification Changes Over Time in *BRCA1* and *BRCA2*,” Chloe Mighton, et al *Genetics in Medicine* (2019) 21:2248-2254.

6. Attached hereto as Exhibit 5 is a true and correct copy of of the Order in Valadez v. Johnson & Johnson, et al. regarding Hearing on Motion to Compel, dated May 4, 2023.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Second Amended Rule 26 Expert Report of Shawn Levy, PHD, dated May 28, 2024.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Expert Report of Cheryl C. Saenz, M.D. (Newsome), dated May 28, 2024.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Expert Report of Cheryl C. Saenz, M.D. (Judkins), dated May 28, 2024.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Expert Report of Cheryl C. Saenz, M.D. (Converse), dated May 28, 2024.

11. Attached hereto as Exhibit 10 is a true and correct copy of the Expert Report of Cheryl C. Saenz, M.D. (Rausa), dated May 28, 2024.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Deposition of Michael Finan, M.D. (MDL), dated June 26, 2024.

13. Attached hereto as Exhibit 12 is a true and correct copy of the Press Release written by Owen Dyer entitled “Johnson & Johnson Recalls its Baby Powder after FDA Finds Asbestos in Sample” published in BMJ on October 21, 2019.

14. Attached hereto as Exhibit 13 is a true and correct copy of the Expert Report of William E. Longo, Ph.D. and Mark W. Rigler, Ph.D., dated February 1, 2019.

15. Attached hereto as Exhibit 14 is a true and correct copy of the 4th Supplemental Expert Report of William E. Longo, Ph.D., dated April 29, 2024.

16. Attached hereto as Exhibit 15 is a true and correct copy of the Third Amended Expert Report of Judith Wolf, MD (General), dated May 28, 2024.

17. Attached hereto as Exhibit 16 is a true and correct copy of an Excerpt of the International Agency for Research on Cancer (IARC), Volume 100C, *Arsenic, Metals, Fibres and Dusts* (2012).

18. Attached hereto as Exhibit 17 is a true and correct copy of the 3rd Amended Rule 26 Expert Report of Daniel L. Clarke-Pearson, MD (General), dated May 28, 2024.

19. Attached hereto as Exhibit 18 is a true and correct copy of “*Carcinogenicity of talc and acrylonitrile*,” Stayner, et al., Lancet Oncol, July 5, 2024.

15. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: July 23, 2024

/s/P. Leigh O'Dell
P. LEIGH O'DELL